



Regulatory Advisory

September 9, 2008



TRU Advisory: 08-03, Rev. 2

Use of BIC-Codes and Reporting Marks In Place of ARB Identification Numbers

The purpose of this advisory is to explain how companies may elect to use BIC-Codes, and reporting marks in place of ARB Identification Numbers (IDN). This advisory does not apply to company equipment numbers which cannot to be used in place of the ARB IDNs since they are not truly unique across all companies.

Background

The Transport Refrigeration Unit (TRU) Airborne Toxic Control Measure (ATCM) requires owner/operators of California-based¹ TRUs and TRU generator sets (genset) to apply for ARB Identification Numbers (IDN) and affix or paint the IDNs onto the TRU or TRU generator set (genset) housing (ref. title 13, California Code of Regulations, section 2477, subsection (e)(E)). This registration program allows the California Air Resources Board (ARB) to track compliance with the TRU ATCM's in-use performance standards and reduce the inspection times at border crossings, scales, distribution centers, and truck stops. ARB IDNs are voluntary for out-of-state-based units.

Some large TRU fleets and most (if not all) TRU genset fleets use their own equipment numbers to help them track their equipment. In the case of TRU gensets and refrigerated shipping containers, the numbering system meets the ISO standard 6346 and is administered by the Bureau International des Containers (BIC), an international organization. The BIC publishes their assigned company codes in their Intermodal Equipment Registry. Railcars use a similar equipment numbering system with company codes, called reporting marks, assigned by the Association of American Railroads (AAR). These equipment numbers use a three to four alpha character prefix that is assigned to a company by the BIC or AAR, followed by a unique six-digit numeric serial number that the company assigns to a specific piece of equipment and a check-digit. TRU genset fleets and railroads have requested they be allowed to use their BIC-Codes and reporting marks in lieu of the ARB IDNs to avoid confusion, costs, duplication, and space limitations.

What are ARB's policies?

Until further notice, on a pilot basis, ARB will allow the use of BIC-Codes, or reporting marks in place of ARB IDNs, provided the following terms and conditions are met:

- A. The owner must still apply for an ARB IDN if the unit is California-based.
- B. The BIC-Code, or reporting mark must be unique for each piece of equipment. The TRU or TRU genset owner cannot use one number for multiple units.
- C. The BIC-Code, or reporting mark must meet ARB requirements:
 1. The location of the BIC-Code, or reporting mark shall be as follows:

¹ "California-Based TRUs and TRU Gen Sets" means TRUs and TRU gen sets equipped on trucks, trailers, shipping containers, or railcars that a reasonable person would find to be regularly assigned to terminals within California. If a company sequesters or domiciles in California a portion of their equipment that complies with the TRU ATCM in-use performance standards to ensure there is a pool of compliant equipment available, these units would require IDN applications.

- a. Rail car TRUs – both sides of the rail car. Railroads have requested they not be required to apply the IDN or railcar's reporting mark to the TRU housing because the TRU is sometimes located inside a protective outer wall, such that a number on the TRU housing would not be visible from most angles. ARB believes this is practical and therefore will allow this practice, but only under the proviso that if the TRU is replaced, the owner shall be required to revise the IDN information within 30 days to reflect all of the unit, engine, and compliance status information for the replacement TRU (ref. 13 CCR 2477, subsection (e)(E)1.c.I. and (f)(1)(A)2.)
 - b. Domestic shipping container TRUs - both sides of the shipping container. Note that domestic shipping containers are equipped with refrigeration systems powered by integral internal combustion engines.
 - c. TRU gensets – both sides of TRU/TRU genset housing.
2. Letters and numbers shall contrast sharply in color with the color of the background surface on which the letters and numbers are placed.
 3. Letters and numbers shall be readily legible during daylight hours, from a distance of 50 feet (15.24 meters) while unit is stationary.
 4. Marking shall be kept maintained in a manner that retains the legibility required above.

This pilot program may be suspended by ARB if the affected fleets fail to meet the above terms and conditions or the enforceability of the affected TRU ATCM subsections is challenged.

Company equipment numbers are not allowed in place of ARB IDNs because these numbers are not truly unique across all companies. There is no company code prefix that is assigned by an international organization to go with the subsequent company equipment number that would make the combined number unique.

Related Issues:

- I. TRU genset owners have indicated they may use color-coded stickers to help them identify units that meet the TRU ATCM's in-use performance standards. ARB inspectors will disregard such markings and may conduct inspections to verify compliance.
- II. TRU and TRU genset fleets have requested the ability to apply for ARB IDNs for multiple units using electronic batch uploads via the Internet. ARB is planning to allow this, provided information is submitted in the proper format, and is complete and accurate. Please see Advisory 08-06 (coming soon) for these requirements.
- III. Rental and lease TRUs and TRU gensets must follow special procedures that are described in Advisory 08-04 (coming soon).
- IV. Financial Institutions that hold title as legal owners of TRUs or TRU generator sets and lease this equipment (as lessors), but contractually assign all legal responsibility for complying with laws to the lessee (including the responsibility for ARB IDN applications and compliance with the in-use performance standards) must follow Advisory 08-04.

Other regulatory advisories may be found at: <http://www.arb.ca.gov/diesel/tru/advisories.htm>

For more information

To obtain a copy of the regulation or other related compliance assistance documents, visit the TRU website at <http://www.arb.ca.gov/diesel/tru.htm>. Additional questions may be addressed by calling the toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM).

If you have a disability-related accommodation need, please go to <http://www.arb.ca.gov/html/ada/ada.htm> for assistance or contact the ADA Coordinator at (916) 323-4916. If you are a person who needs assistance in a language other than English, please contact the Bilingual Coordinator at (916) 323-7053.